

1 RANDALL S. LUSKEY (SBN: 240915)

2 rluskey@paulweiss.com

3 **PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**

4 535 Mission Street, 24th Floor

5 San Francisco, CA 94105

6 Telephone: (628) 432-5100

7 Facsimile: (628) 232-3101

8 ROBERT ATKINS (*Pro Hac Vice* admitted)

9 ratkins@paulweiss.com

10 CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)

11 cgrusauskas@paulweiss.com

12 ANDREA M. KELLER (*Pro Hac Vice* admitted)

13 akeller@paulweiss.com

14 **PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**

15 1285 Avenue of the Americas

16 New York, NY 10019

17 Telephone: (212) 373-3000

18 Facsimile: (212) 757-3990

19 *Attorneys for Defendants*

20 UBER TECHNOLOGIES, INC.;

21 RASIER, LLC; and RASIER-CA, LLC

22 [Additional Counsel Listed on Signature Page]

23 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

24 IN RE: UBER TECHNOLOGIES, INC.,  
25 PASSENGER SEXUAL ASSAULT  
LITIGATION

26 Case No. 3:23-md-03084-CRB

27 Judge: Honorable Charles Breyer

28 **DEFENDANTS AND CROSS-  
CLAIMANTS UBER TECHNOLOGIES,  
INC.; RASIER, LLC, AND RASIER-CA,  
LLC'S SECOND REQUEST FOR  
ADMINISTRATIVE RELIEF FROM  
SERVICE DEADLINE (Local Rule 7-11);  
[PROPOSED] ORDER**

This Document Relates to:

*M.C. v. Uber Technologies, Inc., et al.*

Case No.: 3:24-cv-03608-CRB

On November 5, 2024, Defendants/Cross-Claimants Uber Technologies, Inc., Raiser, LLC, and Raiser-CA, LLC filed their Cross-Claims against Cross-Defendant Desalegne Nega. Fed. R. Civ. P. 4(m) provides ninety (90) days for service of a complaint. *See* Fed. R. Civ. P. 4(m) (“If a defendant is not served within 90 days after the complaint is filed, the court--on motion or on its own after notice to the plaintiff--must dismiss the action without prejudice against that defendant or order that service be made within a specified time. But if the plaintiff shows good cause for the failure, the court must extend the time for service for an appropriate period.”). After multiple unsuccessful service attempts, on February 3, 2025 Uber filed a request for administrative relief from the service deadline. (ECF 26). On February 5, 2025, the Court granted Uber’s request for administrative relief and ordered that the service deadline for the Cross-Claims be extended to and including April 4, 2025. (ECF 27).

Cross-Claimants have been diligently attempting to serve Cross-Defendant with the Summons and Cross-Claims. But, to date, Cross-Defendant has not yet been served in this matter. Cross-Claimants respectfully request the Court grant another 60-day extension to complete service or take other appropriate action regarding Cross-Defendant. Good cause exists for this Court to extend the service deadline because Cross-Claimants have been diligently attempting to locate addresses for and to serve Cross-Defendant.

Cross-Claimants, through attorneys of record Shook, Hardy & Bacon, hired First Legal, a legal solutions firm, to assist with locating and serving Cross-Defendant. In January 2025, First Legal indicated it conducted a skip trace to ascertain the current whereabouts of Cross-Defendant. Over time, First Legal made several attempts to serve the Cross-Defendant at 5415 W. Harmon Ave., Unit 2004, Las Vegas, NV 89103-7014. These attempts were unsuccessful, as a resident of that location indicated Cross-Defendant no longer lives there. First Legal subsequently identified the possible address 8215 Stoneheather Ct. Las Vegas, NV 89117 for Cross-Defendant.

On March 17, 2025 Cross-Claimants filed the summon returned unexecuted regarding the 5415 W. Harmon Ave., Unit 2004 Las Vegas, NV 89103-7014 address and filed the proposed summons for the 8215 Stoneheather Ct. Las Vegas, NV 89117 address. The next day, the Court issued the summons for Cross-Defendant at 8215 Stoneheather Ct. Las Vegas, NV 89117.

On March 21, 2025, First Legal attempted to serve Cross-Defendant at 8215 Stone Heather Ct., Las Vegas, NV 89117. The process server indicated that he spoke to a woman (who did not provide her name) through a security screen. The woman told the process server that Cross-Defendant does not live there and that Cross-Defendant was her brother's friend that stayed there only for a few weeks while he found his own place. The woman did not provide a new address for Cross-Defendant.

On March 25, 2025 Cross-Claimants, through attorneys of record Shook, Hardy & Bacon, requested First Legal to conduct another skip trace for a new address for Cross-Defendant. First Legal conducted the search and has not located an alternate address.

In an effort to find an updated address for Cross-Defendant, on April 2, 2025, Cross-Claimants, through attorneys of record Shook, Hardy & Bacon, obtained a new Accurint report and a TLO report, but the reports reiterated 5415 W Harmon Ave Unit 2004, Las Vegas, NV 89103-7014 as the most recent address. Moreover, Cross-Claimants through attorneys of record have also searched for Cross-Defendants' social media, but no social media has been located. The Accurint and TLO reports, however, provide possible phone numbers for Cross-Defendant. Cross-Claimants have been and intend to continue investigating to identify other addresses and ways to serve Cross-Defendant.

Cross-Claimants respectfully request the Court grant an additional 60-day extension to complete service on Cross-Defendant (or take appropriate action), allowing to and including June 3, 2025 to effect service.

19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 DATED: April 4, 2025

Respectfully submitted,

2  
**SHOOK, HARDY & BACON L.L.P.**3  
By: /s/ Maria Salcedo  
4 MARIA SALCEDO5 MARIA SALCEDO (Admitted *Pro Hac Vice*)  
6 msalcedo@shb.com  
7 **SHOOK, HARDY & BACON L.L.P.**  
2555 Grand Blvd.  
8 Kansas City, MO 64108  
Telephone: (816) 474-6550  
9 Facsimile: (816) 421-554710 MICHAEL B. SHORTNACY (SBN: 277035)  
mshortnacy@shb.com  
11 **SHOOK, HARDY & BACON L.L.P.**  
2121 Avenue of the Stars, Suite 1400  
12 Los Angeles, CA 90067  
Telephone: (424) 285-8330  
Facsimile: (424) 204-909313  
14 PATRICK OOT (Admitted *Pro Hac Vice*)  
oot@shb.com  
15 **SHOOK, HARDY & BACON L.L.P.**  
1800 K St. NW Ste. 1000  
16 Washington, DC 20006  
Telephone: (202) 783-8400  
17 Facsimile: (202) 783-4211  
18 *Attorney for Defendants*  
19 UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC20  
21 KYLE N. SMITH (*Pro Hac Vice* admitted)  
ksmith@paulweiss.com  
22 JESSICA E. PHILLIPS (*Pro Hac Vice* admitted)  
jphillips@paulweiss.com  
23 **PAUL, WEISS, RIFKIND, WHARTON**  
**& GARRISON LLP**  
24 2001 K Street, NW  
25 Washington DC, 20006  
Telephone: (202) 223-7300  
26 Facsimile: (202) 223-7420